

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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Del Shea Perry, Trustee for the Heirs and  
Next of Kin of Hardel Harrison Sherrell and  
Personal Representative for the Estate of  
Hardel Harrison Sherrell,

Case No. 19-cv-02580 KMM/LIB

Plaintiff,

vs.

Beltrami County;  
MEnD Correctional Care, PLLC;  
Sanford Health;  
Sanford; Sanford Medical Center Fargo;  
Calandra Allen (Jail Administrator),  
Andrew Richards (Assistant Jail  
Administrator), Edward Busta (Program  
Director),  
Corrections Sergeant Tyler Carraway,  
Corrections Sergeant Anthony Derby,  
Corrections Sergeant Mario Scandinato,  
Corrections Officer Melissa Bohlmann,  
Corrections Officer Jared Davis,  
Corrections Officer Dana Demaris,  
Corrections Officer Brandon Feldt,  
Corrections Officer James Foss,  
Corrections Officer Daniel Fredrickson,  
Corrections Officer Chase Gallinger,  
Corrections Officer Holly Hopple,  
Corrections Officer Nicholas Lorsbach,  
Corrections Officer Erin Meyer,  
Corrections Officer Mitchell Sella,  
Corrections Officer Christopher Settle,  
Corrections Officer Marlon Smith,  
Corrections Officer Jacob Swiggum,  
Corrections Officer Joseph Williams,  
Beltrami County employees, all in their  
individual and official capacities and as

agents/employees of Beltrami County; Todd Leonard, MD, Crystal Pedersen, RN, Michelle Skroch, RN, and Madison Brewster, Health Technician, MEnD Correctional Care employees, all in their individual and official capacities and as agents/employees of MEnD Correctional Care, PLLC; Dustin G. Leigh, MD, individually and as employee/agent of Sanford Health and/or Sanford and/or Sanford Medical Center Fargo,

Defendants.

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#### **MOTION FOR SUMMARY JUDGMENT**

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TO: Plaintiff and her attorney, Zorislav R. Leyderman, 222 South 9th Street, Suite 1600, Minneapolis, MN 55402

YOU WILL PLEASE TAKE NOTICE that the undersigned attorneys for Defendants Beltrami County, Calandra Allen, Melissa Bohlmann, Edward Busta, Tyler Carraway, Jared Davis, Dana Demaris, Anthony Derby, Brandon Feldt, James Foss, Daniel Fredrickson, Chase Gallinger, Holly Hopple, Nicholas Lorsbach, Erin Meyer, Andrew Richards, Mario Scandinato, Mitchell Sella, Christopher Settle, Marlon Smith, Jacob Swiggum, Joseph Williams will move the above-named Court for an Order directing that, pursuant to Rule 56 of the Federal Rules of Civil Procedure, Defendants are entitled to summary judgment in their favor dismissing the action on the general grounds that there is no genuine issue

as to any material fact and that Defendants are entitled to a judgment as a matter of law.

Dated: June 1, 2022

s/Julia C. Kelly

Jason M. Hiveley, #311546  
Stephanie A. Angolkar #388336  
Julia C. Kelly, #0392424  
Aaron M. Bostrom, #0401773  
IVERSON REUVERS  
9321 Ensign Avenue South  
Bloomington, MN 55438  
jasonh@iversonlaw.com  
stephanie@iversonlaw.com  
julia@iversonlaw.com  
aaron@iversonlaw.com  
(952) 548-7200

*Attorneys for Beltrami County,  
Calandra Allen, Melissa Bohlmann,  
Edward Busta, Tyler Carraway, Jared  
Davis, Dana Demaris, Anthony Derby,  
Brandon Feldt, James Foss, Daniel  
Fredrickson, Chase Gallinger, Holly  
Hopple, Nicholas Lorsbach, Erin Meyer,  
Andrew Richards, Mario Scandinato,  
Mitchell Sella, Christopher Settle,  
Marlon Smith, Jacob Swiggum, Joseph  
Williams*